

BEFORE THE
COPYRIGHT ROYALTY TRIBUNAL
Washington, D.C. 20009

In the matter of)
1989 Satellite Carrier) CRT Docket No. 91-1-89SCD
Distribution Proceeding)

COMMENTS OF GANNETT CO., INC.
ON EXISTENCE OF CONTROVERSY AND NOTICE
OF INTENT TO PARTICIPATE

I. Comments on Existence of Controversy

In response to the Tribunal's May 14, 1991 Notice, on behalf of Gannett Co., Inc. (Gannett),^{*/} we submit these comments regarding the existence of a controversy for the 1989 Satellite Carrier Copyright Royalty Distribution Proceeding. While Gannett is not formerly affiliated with any other claimant, it has engaged in settlement discussions with Program Suppliers and Broadcast claimants. Gannett believes that in light of the various new issues raised by this royalty and the limited size of the royalty pool, it is premature to declare a controversy. The parties should be encouraged to seek settlement of their claims.

II. Notice of Intent to Participate

Gannett hereby notifies the Tribunal of its intent to participate in the Program Suppliers and Commercial Broadcast Categories. Gannett's claim is for syndicated television series and specials, local and public affairs programming.

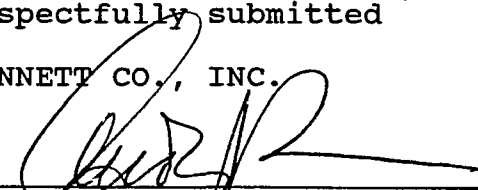
^{*/} Gannett Co., Inc. is the parent of claimants Pacific and Southern Co., Inc., licensee of WXIA-TV and KUSA Broadcasting, Inc., licensee of KUSA-TV. The signals of both KUSA-TV and WXIA-TV are retransmitted to the home dish community.

Counsel to be served with all documents filed with the Tribunal are identified below.

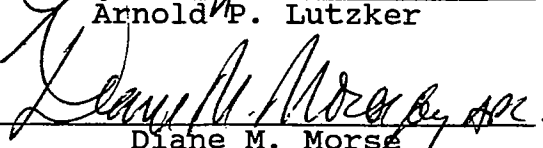
Respectfully submitted

GANNETT CO., INC.

By


Arnold P. Lutzker

By


Diane M. Morse

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June 24, 1991

CERTIFICATE OF SERVICE

I, Arnold P. Lutzker, do hereby certify that I have this twenty-fourth day June, 1991, mailed by first class United States mail, postage pre-paid, the foregoing "Comments of Gannett Co., Inc. on the Existence of Controversy and Notice of Intent to Participate" to the following:

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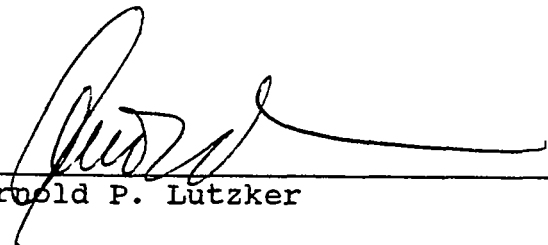
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June 24, 1991